



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue  
Seattle, WA 98101

March 31, 2008

Reply to

Attn. of: ETPA-088

Ref: 02-014-BLM

Terry Lee Smith  
FMDA Project Manager  
Pocatello Field Office  
4350 Cliffs Drive  
Pocatello, Idaho 83204

Dear Mr. Smith:

The U.S. Environmental Protection Agency (EPA) has reviewed the **Final Environmental Impact Statement (FEIS) for the Proposed Fire, Fuels, and Related Vegetation Management Direction Plan Amendment** pursuant to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

On February 3, 2005, EPA provided written comments to the Bureau of Land Management (BLM) regarding the Draft Environmental Impact Statement (DEIS). We rated the DEIS and the proposed action alternatives as Environmental Concerns – Insufficient Information (EC-2). We raised several issues in our comment letter, including: (1) air quality impacts to wildlife and prescribed fire treatment, (2) grazing impacts, (3) species status, and (4) chemical treatment impacts to wildlife.

The FEIS identifies Alternative E as the Proposed Plan Amendment (Preferred Alternative). Alternative E combines the sagebrush steppe component of Alternative D with the forested vegetation component of Alternative C. Although Alternative E would provide protection for the remaining sagebrush steppe habitat in the Upper Snake River Plain, it would allow Wildland Fire Use (WFU) Areas as proposed under Alternative C.

While EPA supports the protection of sagebrush steppe ecosystems and its associated wildlife species, such as the sage grouse, the larger WFU Areas allowed in Alternative E could result in potential environmental impacts. We believe that additional siting information along with monitoring measures could lessen those impacts. Therefore, EPA continues to make the following recommendations:

**Air Quality Impacts from Wildfire and Prescribed Fire Treatment**

In the DEIS, EPA raised concerns that wildfire and prescribed fire treatments would result in increased particulate concentrations that could negatively affect air quality. We recommended that the location of potential prescribed wildfires be identified in the EIS and a representative monitoring program be established prior to initiating prescribed burn treatments.

We understand this EIS is a programmatic document which would provide the direction for amending the twelve existing Land Use Plans (LUPs) in the Upper Snake River District in Idaho. More specific actions regarding fire management decisions would be made through site specific Fire Management Plans. Therefore, to address our concerns, we are recommending BLM include a discussion in the Record of Decision (ROD) that site specific locations and treatments for wildfire and prescribed fire treatments will be identified in the planning area wide LUPs and the Fire Management Plans. In addition, an air quality monitoring program should be implemented prior to initiating wildfire and prescribed fire treatments in the planning areas.

#### **Chemical Treatment Impacts on Wildlife**

In the DEIS, EPA expressed concerns that chemical treatments may result in negative impacts to wildlife. We recommended that the types of chemicals being considered for use as treatments and their potential acute and chronic impacts on the survival and reproduction of wildlife species and populations be discussed in the EIS. In addition, the EIS should include monitoring plans to assess the chemical treatment impacts for individual project plans. Therefore, to address our concerns, we are recommending that the ROD include a commitment to disclose this information through corresponding site-specific NEPA processes.

We appreciate the opportunity to review the FEIS for the Proposed Fire, Fuels, and Related Vegetation Management Direction Plan Amendment. If you have any questions regarding this letter, please do not hesitate to contact Mark Jen of my staff at (907) 271-3411.

Sincerely,

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Christine B. Reichgott, Manager  
NEPA Review Unit